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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street San Francisco, CA 94105-3901

1	IN THE MATTER OF:) Order No. 95-15
2 3 4 5 6 7 8 9	Omega Chemical Corporation 12504 E. Whittier Boulevard Whittier, CA 90602	ADMINISTRATIVE ORDER PURSUANT TO SECTION 106 OF THE COMPREHENSIVE ENVIRONMENTAL RESPONSE COMPENSATION AND LIABILITY ACT OF 1980 as amended, 42 U.S.C. Section 9606(a)
10 11	RESPONDENTS:) bección 3000(a)
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13 14 15 16 17 18 19 20 21 22 23 24	Listed in Appendices A & B)))))))))))))))))))

PREAMBLE 25

> This Administrative Order (Order) is issued on this date to the Respondents, pursuant to the authority vested in the President of the United States by Section 106(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, 42 U.S.C. Section 9606(a), as amended by the Superfund Amendments and Reauthorization Act of 1986, Pub. L. 99-499 (CERCLA), delegated to the Administrator of the United States Environmental Protection Agency ("U.S. EPA") by Executive Order No. 12580, January 23, 1987, 52 Federal Register 2923, further delegated to the EPA Regional Administrators by U.S. EPA Delegation Nos. 14-14-A and 14-14-B, and further redelegated to the Director, Hazardous Waste Management Division by Region IX Delegations 1290.41 and 1290.42.

The State of California has been notified of the issuance of this Order as required by Section 106(a) of CERCLA, 42 U.S.C. Section 9606(a).

This Order pertains to the Omega Chemical Corporation Site property located at 12504 E. Whittier Boulevard, Whittier, California ("the Site"). This Order requires the Respondents to undertake and complete removal activities to abate an imminent and substantial endangerment to the public health and welfare or the environment that may be presented by the actual or threatened release of hazardous substances at or from the Site.

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PARTIES BOUND

This Order applies to and is binding upon Respondents and Respondents' heirs, receivers, trustees, successors and assigns. Any change in ownership or corporate status of Respondents including, but not limited to, any transfer of assets or real or personal property shall not alter such Respondents responsibilities under this Order. Respondents are jointly and severally liable for carrying out all activities required by this Order. Compliance or noncompliance by one or more Respondents with any provision of this Order shall not excuse or justify noncompliance by any other Respondent. Respondents shall ensure that their contractors, subcontractors, and representatives comply with this Order. Respondents shall be responsible for any noncompliance.

FINDINGS OF FACT

Based on available information, including the Administrative Record in this matter, U.S. EPA hereby finds:

1. <u>Site Description/Location</u>

The Omega Chemical Corporation Site is located at 12504 E. Whittier Boulevard, Whittier, California. Omega Chemical Corporation is a spent solvent recycling and treatment facility (primarily chlorinated hydrocarbons and chlorinated fluorocarbons) which operated from 1976 until at least 1991. Omega utilized a variety of chemicals, thermal and physical treatment processes to recycle and reduce wastes. Drums and bulk loads of waste solvents and chemicals from various industrial activities were processed to produce commercial products. Waste generated from the treatment activities included still bottoms, aqueous fractions, and non-recoverable solvents.

The Site is approximately 40,000 square feet and is comprised of two buildings, a warehouse (150 by 160 feet) and an administrative building (80 by 30 feet) surrounded by a service yard. Waste management units located at the facility include drum storage areas, storage tanks, and distribution towers. The two drum storage areas contain approximately 3,000, 55-gallon drums that contain wastes and are supported on wooden pallets and stacked in rows three drums high. There are five, 5,000 gallon above ground storage tanks, allegedly containing

residual process sludge located in the western portion of the property. The tanks sit on a concrete pad and are surrounded by low walls. In addition, partially dismantled process equipment, and numerous cylinders of various sizes and other treatment units are located throughout the Site.

The service yard appears to be paved with The drums storage areas consist of two large concrete concrete. Prior to 1989, it is alleged that the storage areas were unpaved or paved with asphalt that was not impervious to hazardous waste migration. Ground beneath the tank storage area in the southwest corner of the facility was noted as having a deteriorating asphalt base during an April 1985 California Department of Health Services ("DHS") inspection for Interim Status Document Compliance. At the present, the concrete is cracked in some areas and has saw-cut joints for expansion. There are sumps located at the facility which may have served as points of collection for surface runoff. The west, east, and south boundaries of the property are enclosed with a concrete block wall approximately 2 feet high. The concrete and interior fences of the containment walls are not protected with chemicalresistant coating. The facility's fence is only 4 feet high along the northeast boundary and allows easy access to teenagers and other persons who congregate at numerous public facilities in the area.

The Site is located in the City of Whittier, a community of approximately 77,000 people. The Site comprises a mix of industrial, commercial, and residential property. The area is zoned heavy industrial M-1; however, there is a public skating rink located adjacent to the east of the Site and Kaiser Hospital to the west. Residential areas are located across the street to the south and there are three elementary schools and two high schools within a one-mile radius of the facility. There are several additional elementary schools, public parks, and Whittier College located between one and two miles from the Site.

2. Respondents

Respondent Omega Chemical Corporation is a corporation incorporated under the laws of California. Respondent Omega Chemical Corporation holds title to the property located at 12504 E. Whittier Boulevard, Whittier, California. Omega Chemical Corporation operated the Site from in or about the years from 1976 to at least 1991.

Respondent Dennis O'Omeara is an individual who resides in the State of Nevada. Mr. O'Omeara is the President of Omega Chemical Corporation and operated the Site in or about the years from 1976 to at least 1991.

Based on California Department of Toxic Substance Control's ("DTSC") computer database for hazardous waste manifests, in or about the years from 1988 to 1991, the Respondents identified in Appendix A arranged for disposal or treatment, or arranged with a transporter for transport for disposal or treatment of greater than ten (10) tons of hazardous waste to the Omega Chemical Corporation Site.

3. <u>Incident/Release Characteristics</u>

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46 47 48 The Omega facility operated as an off-site hazardous waste treatment and storage facility under Interim Status designation from 1976 until 1991. The facility's contractors detected releases of RCRA wastes to soil and groundwater in a 1988 study. The Omega Chemical Corporation entered into an Administrative Order on Consent, U.S. EPA Docket No. RCRA-09-91-0005 ("RCRA Order") to implement a RCRA facility investigation and interim measures which was signed by EPA on October 17, 1991. In 1991, the State of California brought a civil action against Omega Chemical Corporation and Mr. Dennis O'Meara, the President of Omega Chemical Corporation, in the Superior Court for Los Angeles County, which resulted in the Court ordering Omega to cease operations, remove all hazardous waste and close the facility.

On August 27, 1993, at the request of the DTSC, EPA Federal On-Scene Coordinator, Richard Martyn, tasked the Technical Assistance Team ("TAT") to conduct a site assessment at the Omega Site. During the assessment, TAT observed approximately 2900 drums of hazardous wastes that entirely filled all available storage space at the Site. The drums were situated on pallets, sometimes three high and stacked in rows across the Site. Many of the drums were weathered from years of outside storage; however, only a few of the drums inspected displayed any signs of gross deterioration or were leaking. The DTSC concern at this time was to oversee implementation of a drum removal action and site restoration activities. The conclusion reached from the 1993 TAT assessment was that Omega represented a significant waste management problem, however the State was working with the owner/operator, and the Site should remain State lead. Since that 1993 assessment, the DTSC and EPA's RCRA program have been actively pursuing the owner/operator to perform a cleanup of the property. The State of California brought a contempt action against Omega Chemical Corporation and Mr. O'Meara, and in January 1995, the Superior Court found Mr. O'Meara and Omega in contempt of its orders and ordered that Mr. O'Meara and Omega cease all operations at the Site and cooperate fully in all efforts to investigate and implement appropriate action at the site. The State brought a criminal action against Mr. O'Meara, and at the end of March 1995, Mr. O'Meara plead guilty to two felony counts of illegal storage and disposal.

In January 1995, DTSC again requested that EPA provide assistance in reevaluating conditions at the Site. Another preliminary assessment was conducted on January 19, 1995, and the following conditions were observed at the facility: 1) over 3,000 drums were observed stacked three high, some without pallets between them; 2) a large majority of the drums appeared to be extremely corroded; 3) numerous drums were observed leaking onto other drums and onto the concrete pad; and 4) numerous spills were observed leading away from the drums to other parts of the property.

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At a meeting held by the DTSC on February 1, 1995, written notice of Federal Interest was issued to the owner and operator and to a group of companies that sent waste to the site. Since that meeting the owner/operator hired an environmental contractor, overpacked 83 leaking 55-gallon drums and submitted a workplan for the removal of the containers to the State and EPA for comment. The State and EPA found the plan to be deficient and sent comments to the owner/operator. On March 27, 1995, the attorney representing the owner/operator indicated that the owner/operator did not have the financial ability to implement the work in compliance with EPA comments within the time frame required by EPA's letter.

4. Quantities and Types of Substances Present

There are currently approximately 3,000 55-gallon drums stored at the Site which contain hazardous waste. During the overpacking conducted by Omega's contractor, IT Corporation, the drums were initially hazcategorized to better document their contents. Hazcatting revealed halogenated compounds and hazardous waste characteristic of ignitability and corrosivity in the drums. There is a comprehensive description of the potential hazardous wastes handled at the Omega facility in the Administrative Order on Consent (Docket No. RCRA 09-91-005) which was signed by Omega Chemical. In its original RCRA Part A permit application dated October 7, 1980, its revised RCRA Part A application dated October 8, 1987 and its revised Notification of Hazardous Waste activity dated September 24, 1990, Respondent identified itself as handling the following hazardous wastes at the Facility:

Hazardous wastes exhibiting the characteristics of ignitability, corrosivity, reactivity, or toxicity identified at 40 CFR 261.261.24: D001 through D029, D035, D037, D038, D039, D040, and D043.

Hazardous waste from non-specific sources identified at 40 CFR 261.31 and having the following EPA Hazardous Waste Numbers: F001, F002, F003, F004, F005, F007, F008, F008, F010, F011, F020, F022, F027, and F028

1 Hazardous waste from specific sources identified at 2 40 CFR 261.32 and having the following RCRA Hazardous 3 Waste Numbers: K001 through K043, K048 through K052, 4 K062, K083 through K086, K094 through K098, K101, K103, 5 K104 and K105. 6 Discarded commercial chemical products, manufacturing 7 chemical intermediates, off-specification commercial 8 products, or manufacturing chemical intermediates 9 having the following EPA Hazardous Waste Numbers: P001 10 through P122 (all P-series wastes). 11 Discarded commercial chemical products, manufacturing 12 chemical intermediates, off-specification commercial 13 products, or manufacturing chemical intermediates 14 having the following EPA Hazardous Waste Numbers: 15 U001 through U249 (all U-series wastes). 16 Hazardous waste process units that have been identified at the Site, include the following items: 17 18 600 gallon storage tank (unknown contents) 19 gallons per hour incinerator 20 2,000 gallons per day pH modification chemical 21 treatment unit 22 2,000 gallons per day organic compounds reaction chemical treatment unit 23 24 0.5 ton per hour thermal treatment unit 25 20,000 gallons per day low temperature oxidation 26 chemical treatment unit 27 2,000 gallons per day dewatering/drying physical 28 treatment unit 29 2,000 gallons per day distillation physical 30 treatment unit 31 3,000 gallons per day evaporation physical treatment 32 unit 33 2,000 gallons per day solidification/stabilization 34 physical treatment unit 35 200,000 gallon storage tank

5. Threats to the Public Health, Welfare, and Environment

There is the potential for a spill or fire involving halogenated solvents that could cause the release of poisonous gases or cause groundwater pollution. There are fire/explosion hazards associated with over a dozen unmarked/unknown compressed gas cylinders, treatment tanks, thermal destruction units and chemical reaction vessels, bulging drums, liquid and crystalline solids, improper storage of hazardous substances, and potential soil and groundwater contamination. There is the potential for human endangerment due to inadequate site security if the Site walls or fences are breached.

Leaks and spills of various wastes have occurred at the Omega facilitly resulting in documented contamination of the soil and groundwater. Existing data from Omega's contractor (ENSR, Report on Site Assessment Investigations at the Omega facility, October 1988) indicate that groundwater contaminant concentrations exceed removal action levels for drinking water for methylene chloride, 1,1- dichloroethylene, 1,1,1- trichloroethane, trichloroethylene, and tetrachloroethylene. This report identifies significant concentrations of chlorinated hydrocarbons in all the soil samples and the concentrations appeared to increase with depth. As identified in the report, the subsurface investigation and analytical results from the soil and groundwater samples suggest that the soil and groundwater contamination are directly related.

Methylene chloride is a suspected human carcinogen (American Conference of Governmental Industrial Hygienists 1988-1990).

Tetrachloroethylene ("PCE") is a classified as a human carcinogen. The Maximum Contaminant level (MCL) for drinking water is 5 micrograms per liter. Up to 1030 micrograms per liter of PCE was found in groundwater beneath the Site.

Trichloroethylene ("TCE") is classified as a probable human carcinogen. The MCL for TCE is 5 micrograms per liter. Up to 258 micrograms per liter of TCE was detected in groundwater beneath the Site.

1,1-Dichloroethylene ("DCE") is classified as a possible human carcinogen. The MCL for DCE is 6 micrograms per liter. Upt to 1080 micrograms per liter of DCE was detected in groundwater beneath the Site.

Chloroform is a suspected human carcinogen. Up to 24 micrograms per liter were found in groundwater below the site.

1,1,1-Trichloroethane ("Methyl chloroform") is classified as a probable human carcinogen. The MCL for methyl chloroform is 200 micrograms per liter. Up to 2080 micrograms per liter were detected in groundwater beneath the Site.

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CONCLUSIONS OF LAW

Based on the foregoing Findings of Fact and the Administrative Record supporting this removal action, U.S. EPA has concluded that:

- 6. The property on which Omega Chemical Corporation is located at 12504 E. Whittier Boulevard, Whittier, California, is a "facility" as defined by Section 101(9) of CERCLA, 42 U.S.C. Section 9601(9).
- 7. Each Respondent is a "person" as defined by Section 101(21) of CERCLA, 42 U.S.C. Section 9601(21).
- 8. Respondent Mr. Dennis O'Meara is either a person who at the time of disposal of any hazardous substances owned or operated the Site within the meaning of Section 107(a)(2) of CERCLA, 42 U.S.C. Section 107(a)(2) or who arranged for disposal of hazardous substances at the Site within the meaning of Section 107(a)(3) of CERCLA, 42 U.S.C. Section 9607(a)(3).
- 9. Respondent Omega Chemical Corporation is the current "owner" of the Site as defined by Section 101(20) of CERCLA, 42 U.S.C. Section 9601(20) and owned or operated the Site within the meaning of Section 107(a)(2) of CERCLA, 42 U.S.C. Section 107(a)(2).
- 10. Each Respondent identified in Appendix A arranged for disposal or treatment, or arranged for transport for disposal or treatment of hazardous substances at the Omega Chemical Corporation facility within the meaning of Section 107(a)(3) of CERCLA, 42 U.S.C. Section 9607(a)(3).
- 11. Each Respondent is therefore a liable person under Section 107(a) of CERCLA, 42 U.S.C. Section 9607.
- 12. Methylene chloride, Tetrachloroethylene ("PCE"), Trichloroethylene ("TCE"), 1,1-Dichloroethylene ("DCE"), 1,1,1-Trichloroethane ("Methyl chloroform"), characteristic hazardous waste are hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. Section 9601(14), and Section 302.4 of the National Contingency Plan (NCP), 40 CFR Part 300.
- 13. The presence of hazardous waste in deteriorating drums and the presence of Methylene chloride, Tetrachloroethylene ("PCE"), Trichloroethylene ("TCE"), 1,1-Dichloroethylene ("DCE"), and 1,1,1-Trichloroethane ("Methyl chloroform") in the soil and

groundwater constitutes an actual or threatened "release" as that term is defined in Section 101(22) of CERCLA, 42 U.S.C. Section 9601(22).

DETERMINATIONS

Based on the above Findings of Fact and Conclusions of Law, the Director, Hazardous Waste Management Division, EPA Region IX, has made the following determinations:

- 14. The actual or threatened release of hazardous substances from the Facility may present an imminent and substantial endangerment to the public health, welfare, or the environment.
- 15. The actions required by this Order, if properly performed, are consistent with the National Contingency Plan ("NCP"), 40 CFR Part 300 and CERCLA; and are appropriate to protect the public health, welfare, or the environment.
- 16. The conditions present at the Site constitute a threat to public health, welfare, or the environment based upon consideration of the factors set forth in the NCP at 40 CFR Section 300.415(b). These factors include, but are not limited to, the following:
 - a. Actual or potential exposure to hazardous substances by nearby populations, animals, or food chain

A serious threat is the potential for an uncontrolled reaction between highly incompatible and acutely toxic chemicals. Large quantities of waste chlorinated solvents in deteriorating drums along with numerous other hazardous wastes at the Site lie in close proximity to each other. There is a significant risk of failure of the drums, which would cause a subsequent release. A fire involving the chlorinated solvents could cause a poisonous gas release that would be a major public health threat to the surrounding populated area.

b. Weather conditions that may cause hazardous substances to migrate or be released

The weather conditions at the Site have greatly affected the integrity of the drums and other containers. Many of the drums have either failed or are about to fail based on the severe corroding occurring. As the material is released from their containers, wind and rain have spread these materials onto other containers and across the Site where they could be discharged into the surrounding streets, adjacent storm sewers, and eventually into the local creeks and streams.

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c. Actual or potential contamination of drinking water supplies

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Soil and groundwater samples taken by Omega's contractor in 1988 reveal the presence of hazardous contaminants in concentrations that exceed established health-based criteria. The subsurface investigation and analytical results from the soil and groundwater samples suggest that the soil and groundwater contamination are directly related. Deeper aquifers in the vicinity are used for drinking water. The upper and lower aquifers may be hydraulically connected. The city of Santa Fe Springs operates three wells within three miles of the Site.

d. The unavailability of other appropriate Federal or State response mechanisms to respond to the release

The California Department of Toxic Substances has formally transferred this Site to the United States Environmental Protection Agency. The State does not possess the necessary resources to conduct site stabilization and further removal activities at this time.

e. <u>Hazardous substances or pollutants or contaminants in drums, barrels, tanks, or other bulk storage containers that may pose a threat of release</u>

There are over 3,000 drums, numerous tanks, compressed gas cylinders and hazardous waste treatment units currently located at the Site. These containers have been stored at the Omega for many years and are in very poor condition. Over 80 drums were discovered leaking and required overpacking during February and March of 1995, and there are many highly corroded drums where failure is imminent. An unabated release of these materials into the environment may pose a significant threat to the local community.

f. <u>High levels of hazardous substances or pollutants or contaminants in soils at or near the surface, that may migrate</u>

Soil contamination has been detected directly below the drum storage area and it is suspected that this is related to the contamination of the groundwater.

g. Threat of fire and explosion

The materials present on the Site are highly flammable and given the deteriorated condition of the containers, the lack of adequate security and the dense population of surrounding area, there is a significant threat of fire and explosion.

1 <u>ORDER</u>

 Based upon the foregoing Findings, Conclusions, and Determinations, and pursuant to Section 106(a) of CERCLA, 42 U.S.C. Section 9606(a), it is hereby Ordered that the Respondents undertake the following actions under the direction of EPA's On-Scene Coordinator.

- 17. Respondents shall notify EPA in writing by June 1, 1995 stating their irrevocable intent to comply with this Order, except for the activities set forth in paragraphs 21(h-i). Respondents shall notify EPA in writing by September 1, 1995 stating their irrevocable intent to comply with the removal activities set forth in paragraphs 21(h-i) ("Phase II Work") of this Order. In the event any Respondent fails to provide such notice, that Respondent shall be deemed not to have complied with the terms of this Order.
- Within seven (7) calendar days after the effective date of this Order, the Respondents shall submit to U.S. EPA for approval, a Phase I Work Plan for the removal activities set forth in Paragraph 21 (a-g) below. Within three (3) months after the effective date of this Order, the Respondents shall submit to U.S. EPA for approval, a Phase II Work Plan for the removal activities set forth in Paragraph 21 (h-i). The Phase I and Phase II Work Plans shall provide a concise description of the activities to be conducted to comply with the requirements of this Order, and shall include a proposed schedule for implementing and completing the activities. The Phase I and Phase II Work Plans shall be reviewed by U.S. EPA, which may approve, disapprove, require revisions to, or modify the Work The Respondents shall implement the Phase I and Phase II Plans. Work Plans as finally approved by U.S. EPA. Once approved, the Phase I and Phase II Work Plans shall be deemed to be incorporated into and made a fully enforceable part of this Order.
- 19. The Phase I and Phase II Work Plans shall contain a site safety and health plan, a transportation and disposal plan, and a schedule of the work to be performed. The site safety and health plan shall be prepared in accordance with EPA's Standard Operating Safety Guide, dated November, 1984, and updated July, 1988, and with the Occupational Safety and Health Administration (OSHA) regulations applicable to Hazardous Waste Operations and Emergency Response, 29 CFR Part 120.
- 20. The Respondents shall retain an environmental contractor qualified to undertake and complete the requirements of this Order, and shall notify U.S. EPA of the name of such contractor within five (5) days of the receipt of this Order. U.S. EPA retains the right to disapprove of any, or all, of the contractors and/or subcontractors retained by the Respondents.

In the event U.S. EPA disapproves of a selected contractor, the Respondents shall retain a different contractor to perform the work, and such selection shall be made within two (2) business days following U.S. EPA's disapproval.

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- approval of the Phase I Work Plan, the Respondents shall commence implementation of the Work Plan as approved or modified by U.S. EPA. Within three (3) calendar days after U.S. EPA approval of the Phase II Work Plan, the Respondents shall commence implementation of the Phase II Work Plan as approved or modified by U.S. EPA. Failure of any Respondent to properly implement all aspects of the Phase I or Phase II Work Plan shall be deemed to be a violation of the terms of this Order. The Phase I Work Plan shall require the Respondents to perform, and complete within sixty (60) calendar days after approval, at a minimum, the removal activities identified in paragraphs (a-g). The Phase II Work Plan shall require the Respondents to perform, and complete within ninety (90) calendar days after approval, at a minimum, the activities identified in paragraphs (h-i):
 - a. Immediately provide security and restrict access to the Site and prevent any materials, equipment or any other item from being removed from the Site without prior EPA approval.
 - b. Provide security during removal operations.
 - c. Sample and characterize all drums, containers and hazardous materials.
 - d. Perform air monitoring and sampling in accordance with OSHA requirements during all phases of the removal action, especially when there is a potential for airborne releases of toxic air contaminants. Operational controls such as dust suppression will be used to abate fugitive dust emissions.
 - e. Remove or stockpile non-hazardous vehicles, equipment, and debris to provide adequate space for response operations.
 - f. Prepare all hazardous substances for proper transportation for disposal, or where feasible, alternative treatment or reuse/recycle options. The above may include bulking of compatible waste streams, direct shipment of materials appropriate for reuse, recontainerization of materials into DOT specification containers, lab packing small containers, solidification of liquid wastes, and neutralization or other on-site treatment of wastes.

g. Remove grossly contaminated equipment, structures and debris for proper disposal in compliance with state and federal regulations. Decontaminate structures pursuant to applicable state and federal regulations and laws.

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- h. Conduct surface and subsurface soil sampling and groundwater sampling to determine the nature and extent of contamination.
- i. Dispose, stabilize or treat grossly contaminated concrete, asphalt and/or soils found at or near the surface at the direction of the OSC.
- 22. The Respondents shall provide EPA with written weekly summary reports. These reports should contain a summary of the previous week's activities and up-coming activities.
- 23. Respondents shall inform EPA at least forty-eight (48) hours prior to commencement of on-Site work.
- 24. All sampling and analysis shall be consistent with the "Quality Assurance/Quality Control Guidance for Removal Activities": "Sampling QA/QC Plan and Data Validation Procedures," EPA OSWER Directive 9360.4-01, dated April, 1990.
 - 25. Any hazardous substance, pollutant, or contaminant transferred off-Site as a result of this Order must be taken to a facility acceptable under the EPA Off-Site Disposal Policy (OSWER Directive 9834.11, November 13, 1987) in accordance with CERCLA Section 121(d)(3), 42 U.S.C. §9621(d)(3).
 - 26. With five (5) days of receipt of this Order, the Respondents shall designate a Project Coordinator. To the greatest extent possible, the Project Coordinator shall be present on site or readily available during site work. The U.S. EPA has designated Richard Martyn as its On-Scene Coordinator. The On-Scene Coordinator and the Project Coordinator shall be responsible for overseeing the implementation of this Order. To the maximum extent possible, communication between the Respondents and the U.S. EPA, and all documents, reports, and all other correspondence concerning the activities relevant to this Order, shall be directed through the On-Scene Coordinator and the Project Coordinator.
 - 27. The U.S. EPA and the Respondents shall each have the right to change their respective designated On-Scene Coordinator or Project Coordinator. U.S. EPA shall notify the Respondents, and Respondents shall notify U.S. EPA, as early as possible before such a change is made, but in no case less then 24 hours before such a change. Notification may initially be verbal, but shall promptly be reduced to writing.

28. The U.S. EPA On-Scene Coordinator shall have the authority vested in an On-Scene Coordinator by the NCP, 40 CFR Part 300, as amended, including the authority to halt, conduct, or direct any work required by this Order, or to direct any other response action undertaken by U.S. EPA or the Respondents.

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- 29. No extensions to the above time frames shall be granted without sufficient cause. All extensions must be requested in writing, and shall not be deemed accepted unless approved in writing, by U.S. EPA.
- 30. All instructions by the U.S. EPA On-Scene Coordinator or his designated alternate shall be binding upon the Respondents as long as those instructions are not clearly inconsistent with the National Contingency Plan.
- 31. To the extent that the Facility, or other areas where work under this Order is to be performed is owned by, or in possession of, someone other than the Respondents, the Respondents shall obtain all necessary access agreements. In the event that after using their best efforts any Respondent is unable to obtain such agreements, the Respondent shall immediately notify U.S. EPA.
- 32. Respondents, Omega Chemical Corporation and Dennis O'Meara, shall provide access to the Site and participate and cooperate with the Respondents for the performance of the work under this Order. The Respondents shall provide access to the Site to U.S. EPA employees, contractors, agents, and consultants at reasonable times, and shall permit such persons to be present and move freely in the area in order to conduct inspections, including taking photographs and videotapes of the Site, to do cleanup/stabilization work, to take samples, to monitor the work under this Order, and to conduct other activities which the U.S. EPA determines to be necessary.
- 33. Nothing contained herein shall be construed to prevent U.S. EPA from seeking legal or equitable relief to enforce the terms of this Order, or from taking other legal or equitable action as it deems appropriate and necessary, or from requiring the Respondents in the future to perform additional activities pursuant to CERCLA, 42 U.S.C. Section 9601, et seq., or any other applicable law.
- 34. The provisions of this Order and the directions of the On-Scene Coordinator shall be binding on the employees, agents, successors, and assigns of the Respondents.
- 35. The Respondents shall retain copies of all records and files relating to hazardous substances found on the site for six (6) years following completion of the activities required by

this Order and shall make them available to the U.S. EPA prior to the termination of the removal activities under this Order.

The Respondents shall submit a final report summarizing the actions taken to comply with this Order. report shall contain, at a minimum: identification of the facility, a description of the locations and types of hazardous substances encountered at the facility upon the initiation of work performed under this Order, a chronology and description of the actions performed, a discussion of how all problems were resolved, a listing of quantities and types of materials removed from the facility, a discussion of removal and disposal options considered for any such materials, a listing of the ultimate destination of those materials, and a presentation of the analytical results of all sampling and analysis performed and accompanying appendices containing all relevant paperwork prepared during the action (e.g., manifests, invoices, bills, contracts, permits). The final report shall also include the total cleanup costs incurred for all removal activities and an affidavit from a person who supervised or directed the preparation of that report. The affidavit shall certify under penalty of law that based on personal knowledge and appropriate inquiries of all other persons involved in preparation of the report, the information submitted is true, accurate, and complete to the best of the affiant's knowledge and belief. The report shall be submitted within thirty (30) days of completion of the work required by this Order.

37. All notices, reports, and requests for extensions submitted under the terms of this Order shall be sent by certified mail, return receipt requested, and addressed to the following:

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Richard Martyn

On-Scene Coordinator (H-8-3)

U.S. EPA

75 Hawthorne Street

San Francisco, CA 94105

(415) 744-2288

one copy to: John Jaros

Enforcement Officer (H-8-4))

U.S. EPA

75 Hawthorne Street

San Francisco, CA 94105

(415) 744-2316

38. If any provision of this Order is deemed invalid or unenforceable, the balance of this Order shall remain in full force and effect.

1 REIMBURSEMENT OF COSTS

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- 39. Respondents shall reimburse EPA, upon written demand, for all response costs incurred by the United States in overseeing Respondents' implementation of the requirements of this Order. EPA may submit to Respondents on a periodic basis a bill for all response costs incurred by the United States with respect to this Order. EPA's itemized Cost Summary, or such other summary as certified by EPA, shall serve as the basis for payment.
- 40. Respondents shall, within 30 days of receipt of the bill, remit a cashier's or certified check for the amount of those costs made payable to the "Hazardous Substance Superfund" to the following address:
 - U.S. Environmental Protection Agency Superfund Accounting P.O. Box 360863M Pittsburgh, PA 15251
 - 41. Respondents shall simultaneously transmit a copy of the check to the Deputy Director, Hazardous Waste Management Division, U.S. EPA Region 9. Payments shall be designated as Response Costs Omega Chemical Site and shall reference the payor's name and address, the EPA Site identification number and the docket number of this Order.
 - 42. Interest at a rate established by the Department of the Treasury pursuant to 31 U.S.C. Section 3717 and 4 CFR Section 102.13 shall begin to accrue on the unpaid balance from the day after the expiration of the 30 day period notwithstanding any dispute or an objection to any portion of the costs.

MODIFICATIONS

- 43. Modifications to any plan or schedule may be made in writing by the OSC or at the OSC's oral direction. If the OSC makes an oral modification, it will be memorialized in writing within 5 days; provided, however, that the effective date of the modification shall be the date of the OSC's oral direction.
- 35
 44. The rest of the Order, or any other portion of the
 36 Order may only be modified in writing by signature of the
 37 Director of the Hazardous Waste Management Division. If
 38 Respondents seek permission to deviate from any approved plan or
 39 schedule, Respondents' Project Coordinator shall submit a written
 40 request to EPA for approval outlining the proposed modification
 41 and its basis.
 - 45. No informal advice, guidance, suggestion, or comment by EPA regarding reports, plans, specifications,

schedules, or any other writing submitted by the Respondents shall relieve the Respondents of their obligations to obtain such approval as may be required by this Order, and to comply with all requirements of this Order unless it is formally modified.

ACCESS TO ADMINISTRATIVE RECORD

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46. The Administrative Record supporting the selection of the response action for this site is available for review on normal business days between the hours of 9:00 a.m. and 5:00 p.m. in the Office of Regional Counsel, United States Environmental Protection Agency, Region IX, 75 Hawthorne Street, 16th Floor, San Francisco, California. If additional information becomes available, EPA will revise the Administrative Record to reflect such material. To review the Administrative Record contact Jan Carlson at (415) 744-1395. A draft Index to the Administrative Record is enclosed with the Order.

OPPORTUNITY TO CONFER

47. With respect to the actions required above, the Respondents may have a conference with EPA at 10:00 am, May 24, 1995 at the following location:

Long Beach Public Library 101 Pacific Avenue Long Beach, California (310) 570-7500

Respondents may appear in person or be represented by an attorney or other representative. Respondents may present any information regarding this Order. Regardless of whether a conference is held, Respondents may submit any information arguments or comments in writing to EPA within 2 business days following the conference, or within 7 business days of issuance of the Order if no conference is requested. This conference is not an evidentiary hearing, does not constitute a proceeding to challenge this Order, and does not give Respondents a right to seek review of this Order.

48. The Respondents are hereby notified that U.S. EPA will take any action which may be necessary in the determination of U.S. EPA for the protection of public health and welfare and the environment, and Respondents may be liable under Section 107(a) of CERCLA, 42 U.S.C. Section 9607(a), for all past and future costs of these government actions.

PENALTIES FOR NONCOMPLIANCE

49. The Respondents are advised pursuant to Section 106(b) of CERCLA, 42 U.S.C. Section 9606(b), that willful

1 violation or subsequent failure or refusal to comply with this 2 Order, or any portion thereof, may subject each noncomplying 3 Respondents to a civil penalty of up to \$25,000 per day for each 4 day in which such violation occurs, or such failure to comply 5 continues. Failure to comply with this Order, or any portion 6 thereof, without sufficient cause may also subject the 7 8

Respondents to liability for punitive damages in an amount three times the amount of any cost incurred by the government as a

result of the failure of the Respondents to take proper action,

pursuant to Section 107(c)(3) of CERCLA, 42 U.S.C. Section

11 9607(c)(3).

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COMPLIANCE WITH OTHER LAWS

The Respondents shall comply with all applicable 50. federal, state, and local laws and regulations in carrying out the terms of this Order. As indicated above, all hazardous substances removed from the Site must be handled in accordance with the Resource Conservation and Recovery Act of 1976, 42 U.S.C. Section 6921, et seq., the regulations promulgated under that Act, and Section 121(d)(3) of CERCLA, 42 U.S.C. Section 9621(d)(3).

ENDANGERMENT DURING IMPLEMENTATION

The Director, Hazardous Waste Management Division, EPA Region IX, may determine that acts or circumstances (whether related to or unrelated to this Order) may endanger human health, welfare, or the environment, and as a result of this determination, may order the Respondents to stop further implementation of this Order until the endangerment is abated.

GOVERNMENT NOT LIABLE

The United States Government and its employees and other representatives shall not be liable for any injuries or damages to persons or property resulting from the acts or omissions of the Respondents, their employees, contractors, or other representatives caused by carrying out this Order. The United States Government is not a party to any contract with the Respondents.

1	EFFECTIVE DATE
2	53. The effective date of this Order is June 1, 1995 unless modified in writing by EPA.
4 5	THIS ORDER IS ISSUED on this 9th day of May, 1995.
6	UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
7 8 9	By: Keith Take
8	Jeff Zelikson, Director
9	↑UHazardous Waste Management Division
10	United States Environmental Protection Agency
11	Region IX

Contacts:

Richard Martyn
On Scene Coordinator
Emergency Response Section (H-8-3)
United States Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105
(415) 744-2288

John P. Jaros Enforcement Officer Removal Response Section (H-8-4) United States Environmental Protection Agency 75 Hawthorne Street San Francisco, CA 94105 (415) 744-2316

Janet R. Carlson Assistant Regional Counsel (RC-3-1) Office of Regional Counsel United States Environmental Protection Agency 75 Hawthorne Street San Francisco, CA 94105 (415) 744-1395

$\begin{array}{c} \text{APPENDIX A} \\ \\ \text{PRP GENERATOR LIST} \end{array}$

ABEX Aerospace Division c/o Kilpatrick & Cody Attn: Christopher Lyman 700 13th St. NW, Suite 800 Washington, D.C. 20005

ACC Casting Company 11126 Greenstone Avenue Santa Fe Springs, CA 90670

AAD Distribution & Dry Cleaning Attn: Harry Pourat 2306 E. 38th Street Vernon, CA 90058

Air Products & Chemicals, Inc. Attn: Todd Solodar 7201 Hamilton Blvd. Allentown, PA 18195-1501

Alcoa Electronic Packaging, Inc. c/o Leboeuf, Lamb, Green, & McRae Attn: Patricia A. Shaw 601 Grant Street Pittsburgh, PA 15219-1819

Alpha Therapuetic Attn: Edward McQueeney 5555 Valley Blvd. Los Angeles, CA 90032

Amcast Aerospace 11000 Jersey Blvd Rancho Cucamonga, CA 91730

ANJA Engineering Corporation c/o Scripto Tokai Corporation Attn: Fred Ashley 11591 Etiwanda Ave. Fontana, CA 92335

Applied Air Engineering Ind., Inc. Attn: Dennis H. Larkin 13217 Barton Circle Whittier, CA 90605-3255

Applied Magnetics Corp. Attn: Don W. Nelson 75 Robin Hill Road Goleta, CA 93117

Applied Micro Circuits Corp. Attn: Joel O. Holliday 6195 Lusk Blvd. San Diego, CA 92121-2793 Applied Micro Circuits Corp. 5502 Oberlin Drive San Diego, CA 92121

Appropriate Technologies II, Inc. Attn: Thomas C. Vernon 5964 LaPlace Court, Ste 150 Carlsbad, CA 92008

Appropriate Technologies II, Inc. 1700 Maxwell Road Chula Vista, CA 92011

Appropriate Technologies II, Inc. 750 Design Court, # 105 Chula Vista, CA 91911

Arlon, Inc., Adhesives/Film Div. Attn: Gary V. Taylor 2811 South Harbor Blvd. Santa Ana, CA 92704-5805

Armor All Products Corp. 4030 W. Chandler Ave. Santa Ana, CA 92704

Artesia Manufacturing Co. 350 W. Manville Compton, CA 90220

Avery Dennison Attn: Robert Hamilton 1616 South California Ave. Monrovia, CA 91016-4622

BASF Structural Materials, Inc. 1440 N. Kraemer Blvd. Anaheim, CA 92806

Baxter/Bentley Lab, Inc. c/o Latham & Watkins Attn: Robin Hulshizer 633 West 5th Street Los Angeles, CA 90071-2007

Bio Science Enterprises c/o SmithKline Beecham Corporation Attn: Paul Noll One Franklin Plaza (FP 2225) 200 North 16th Street Philadelphia, PA 19102

Bonneville Pacific Corp. Attn: Todd L. Witwer 50 West 300 South, Ste 600 Salt Lake City, UT 84101 Bonneville Pacific Corp.
7325 South Hanson Way, P.O. Box 5699
Santa Maria, CA 93456

Bonanza Aluminum Corp. 11711 Pacific Ave. Fontana, CA 92335

Bonanza Aluminum Corp. 1420 South Bon View Ontario, CA 92335

Broadway
Attn: Lon B. Novatt, Senior Counsel
3880 North Mission Road
Los Angeles, CA 90031

Brown, Burr Attn: Gary C. Tucker, General Counsel P.O. Box 11400 Tucson, AZ 85734

Brown, Burr 6730 South Tucson Blvd. Tucson, AZ 85607

Cabrillo Boat
Attn: Mr. Holland
Berth 41
San Pedro, CA 90731

California Mart
Attn: Rick McNeil
840 Newport Center Dr., Ste 500
Newport Beach, CA 92660-6324

California Mart 110 East 9th Street, Suite #A-727 Los Angeles, CA 90079

CAL TRANS
Attn: Gerald Costello
865 S. Figueroa, Ste 400
Los Angeles, CA 90017

CAL TRANS
Attn: Gary Winters
650 Howe Avenue, Suite 400
Sacramento, CA 95825

Celite Corp. (Lompoc Plant) c/o Manville Corp. Attn: Bruce Ray 717 17th Street P.O. Box 5108 Denver, CO 80202 Central Heating Plant 301 North Broadway Los Angeles, CA

Century Laminators
Attn: Shelly Davis
1225 Knollwood Circle
Anaheim. CA 92801

Century Laminators
Atm: Shelly Davis
1182 Knollwood Circle
Ansheim, CA 92801

Chatsworth Plating Co. 8865 Canoga Ave. Canoga Park, CA 91304

Chem Waste Manager
Attn: P.B. Walker,
Senior Environmental Counsel
2400 W. Union Ave., Ste 200
Englewood, CO 80110

Chem Waste Management c/o Waste Management Inc. Attn: Steve Richtel 3900 S. Wadsworth Blvd., Ste. 800 Lakewood, CO 80235

Cherokee International, Inc. Pc/o Obrien, Gazin, & Peterson Attn: Tom Peterson 611 Anton Blvd. Ste. 120 Costa Mesa, CA 92626

City of Santa Maria
City Attoney's Office
Attn: Wendy Stockton
204 East Cook Street
Santa Maria, CA 93454-5190

Coast to Coast Analytical Services Attn: A.G. Baker Safety and Loss Control 1704 W. North "A" Street Tampa, FL. 33606

Coatings Resource Corp. 12236 Cost Drive Whittier, CA 90601

Columbia Showcase & Cabinet Co. 11034 Sherman Way Sun Valley, Ca 91352 Computer Coating Co. 15607 New Century Drive Gardena, CA 90247

Continental Airlines
Attn: Terri Ann Port, Env. H&S
for Plating Shops
15333 John F. Kennedy Blvd., Ste. 212
Houston, TX 77032

Coral Chemicals
Attn: Louis Caldarelli
10109 Shoemaker Ave.
Santa Fe Springs, CA 90670

Crosby & Overton - Plant #1 Attn: Michael Shloub 1610 West 17th Street Long Beach, CA 90813

Crosby & Overton - Plant #1 Attn: Michael Shloub 1619 West 16th Street Long Beach, CA 90813

Curtis Technology 11391 Sorrento Valley Road San Diego, CA 92121

Cytec Industries, Inc. 1440 N. Kraemer Blvd Anaheim, CA 92806

Datatronics, Inc. Attn: Mark Robinson 238151 Hwy 74 Romaland, CA 92585

Datatronics, Inc. P.O. Box 1398 Romoland, CA 92380

Deutsch Co. Electronic Components c/o Folger & Levin Attn: Scott Bowen 1900 Ave. of the Stars, Ste. 2800 Los Angeles, CA 90067

Discovision Associates 915 E. 23rd Street Carson, CA 90745

Discovision Associates 915 E. 230th Street Carson, CA 90745 Diversey Wyandotte Corp. Attn: David E. Barr, Esq. 12025 Tech Center Drive Livonia, MI 48150-2122

Diversey Wyandotte Corp. P.O. Box 2147 Los Nietos, CA 90610

Dond-Well Adhesives, Inc. 1171 N. Tustin Ave. Anaheim, CA 92807

Eaton Corp./MSC Products Attn: Mark Tennison 1640 Monrovia Ave. Costa Mesa, CA 92627

Eaton Corp./MSC Products Attn: Scott Allery 1111 Superior Avenue Cleveland, OH 44114

Federal Envelope Company c/o CC Industries, Inc. Attn: Tamara Stewart 222 North LaSalle St., Ste. 1000 Chicago, IL 60601

Film Salvage Co. 4901 Exposition Blvd. Los Angeles, CA 90016

Film Salvage Co. P.O. Box 2507 Pomona, CA 91769

Film Salvage Co. 3602 Crenshaw Blvd. Los Angeles, CA 90016

Forest Products 4315 Dominguez Road Rockaw, CA 95677

GAF 11800 Industry Ave. Fontana, CA 92336

Gamma F Corp. Attn: Philip Yan 3051 Fujita Street Torrance, CA 90505

Gamma F Corp. 3111 Fujita Street Torrance, CA 90505 GATX Terminals Corp. Attn: J. Michael Martin 2000 E. Sepulueda Blvd. P.O. Box 9007 Long Beach, CA 90810-1937

The Geon Company Attn: Lee Larson 6100 Oak Tree Blvd. Independence, OH 44131

George Industries, Inc. Attn: Claire Gering 4116 Whiteside Street Los Angeles, CA 90063

Golden West Refining Co. -Attn: Vincent LaPore III 13539 E. Foster Road Santa Fe Springs, CA 90670

Golf Products USA 7350 E. Compton Blvd Paramount, CA 90723

Golf Products USA 15125 Garfield Avenue Paramount, CA 90723

Great Western Chemical Co. Attn: Lee R. Zimmerli 808 Southwest Fifteen Ave Portland, OR 97205

GSF Energy, Inc. Attn: Todd Solodar 7201 Hamilton Blvd. Allenton, PA 18195-1501

Gulfstream Aerospace Corp. Attn: William D. Sherrod 500 Gulf-Stream Rd. P.O. Box 2206, M/S D-02 Savannah, GA 31402-2206

Harpers 2027 Harpers Way Torrance, CA 90501

Hexfet America Attn: Jeff Lequia 41915 Business Park Drive Temecula, CA 92590

Hexfet America 233 Kansas Street El Segundo, CA 90245 High Voltage Trans Services Co. Attn: Bernie A. DeKay 360 N. Palm Street Brea, CA 92621

Hitachi Consumer Products, Inc. Attn: Matthew Clark, Esq. 3890 Steve Reynolds Blvd. Norcross, GA 30093

Hitachi Consumer Products, Inc. 901 East South Street Anaheim, CA 92806

HITCO Materials Division c/o BP America Inc. Attn: Jack Litmer 200 Public Square, 39-E Cleveland, OH 44114-2375

Huck Mfg. Company Attn: Keith Pettus 6 Thomas Irvine, CA 92718

Huck Mfg. Company P.O. Box 5258 Carson, CA 90749

Hughes Missile System c/o General Dynamics Attn: Gerry Hardacre 3302 Pacific Highway (MZ 88-2520) San Diego, CA 92101

Hughes Network Systems 3033 Science Park Drive San Diego, CA 92121

Hughes Network Systems 4128 Sorrento Valley Blvd. San Diego, CA 92121

Jan-Kens Enameling Co., Inc. Attn: Greg Sinatra 715 E. Cypress Monrovia, CA 91016

Jet Propulsion LabCharles L. Buril 4800 Oak Grove Drive Pasadena, CA 91109-8099

Johnson Dielectrics, Inc. P.O. Box 6456 Burbank, CA 91505 KC Photo Engraving Attn: Michael Curley 2666 E. Nina Street Pasadena, CA 91107

Kester Solder Company Attn: Dan Hall 1730 N. Orangethorpe Park Anaheim, CA 92801

Litton Industries, Inc. Attn: Raymond F. Kirkman for Kester Solder Company 360 North Crescent Drive Beverly Hills, CA 90210-4867

Kimberly Clark Corp. Attn: Lynn Bailey 2001 East Orangethorpe Ave. Fullerton, CA 92634

LA Health Services Attn: Olive View Hospital 7533 Van Nuys Blvd. Van Nuys, CA 91405

City of Los Angeles Dept. of Airports Attn: Maurice Z. Laham Environmental Manager for L.A. International Airport 7411 World West Way, P.O. Box 92216 Los Angeles, CA 90009-2216

Le Van Specialty Co. 14923 Proctor Ave. City of Industry, CA 91746

Lear Siegler, Inc. 2910 E. Ana Street Compton, CA 90221

Luxfer USA Ltd. c/o Alcan Aluminum Corp. Attn: John Tillman 100 Erieview Plaza, 17th Floor Cleveland, OH 44114

Fresno Unified School District Attn: Lyn Peters for Maintenance Department 717 South Seventh Street Fresno, CA 93702

Manufacturing Tech, Inc. 2226 Goodyear Avenue Ventura, CA 93003

Marvin Electric Mfg. Co., Inc. c/o Latham & Watkins Attn: Michael Feeley 633 W. Fifth St., Ste. 4000 Los Angeles, CA 90071-2007

Maxwell Laboratories, Inc. Attn: Dean Charles 8888 Balboa Ave. San Diego, CA 92123

May Company Services Center 3447 Grand Ave Los Angeles, CA 90114

McDonnell Douglas Helicopter Co. Attn: David Cohen 10775 Business Center Drive Cypress, CA 90630

MCP Foods (Firmenich) c/o Dorsey & Whitney, P.L.L.P. Attn: Jeffrey L. Sikkema 650 Town Center Drive, Ste 1930 Costa Mesa, CA 92626-1925

MCP Foods (Borden) c/o Sidley & Austin Attn: Judith Praitis 555 West Fifth St., Ste. 4000 Los Angeles, CA 90013

MD Pharmaceutical, Inc. Attn: Edward Griffith 3130 S. Harbor Blvd., Ste. 320 Santa Ana, CA 92704

Metropolitan Water District (MWD) Attn: Jeffery T. DeZellar, P.E. P. O. Box 54153 Los Angeles, CA 90054-0153

Mica Corp. 3530 Hayden Ave. Culver City, CA 90230

Mica Corp. 8536 National Blvd. Culver City, CA 90230

Mico West c/o Sedgewick, Detert, Moran & Arnold Attn: Jeffrey Smith 801 S. Figueroa St., 18th Floor Los Angeles, CA 90017-5556 Microelectronic Packaging Inc. Attn: David Hinkle 9350 Trade Place San Diego, CA 92126

Montgomery Tank Lines Attn: Robert Kasak 3108 Central Drive Plant City, FL 33567

Montgomery Tank Lines Attn: Robert Kasak 2900 Lynwood Road Lynwood, CA 90262

National Broadcasting Co. Attn: Tracy Rich 3000 West Alameda Ave. Burbank, CA 91523

AT&T Global Info Solutions Co. Attn: Kimberly Walsh for NCR Corp./Eng. & Mfg. 101 W. Schantz Ave. Dayton, OH 45479

NCR Corp./Eng. & Mfg. 16550 West Bernardo Drive San Diego, CA 92127

OHLINE, Inc. Attn: Marlo J. Ramos 1930 West 139th Street Gardena, CA 90249

Pacesetters Systems, Inc. c/o Siemens Corporation Attn: Mary Stockel 1301 Ave. of the Americas New York, NY 10019

Pacific Gas & Electric Attn: Beverly Z. Alexander, Esq. P.O. Box 7442 San Francisco, CA 94120

Pacific Gas & Electric Attn: Victor Furtado P.O. Box 7640 San Francisco, CA 94120

Pacific Gas & Electric Attn: John Busterud P.O. Box 770000, B31A San Francisco, CA 94177 Pacific Bell Attn: Irene E. Soto, Environmental Manager 2600 Camino Ramon, Rm 2E150 San Ramon, CA 94583

Pacific Bell Attn: Carolyn S. Attkisson, Esq. 2600 Camino Ramon, Rm 2W953 San Ramon, CA 94583

Pacific Telephone and Telegraph 170 North Fair Oaks, #104 Pasadena, CA 91103

Paradise Beacon 5581 Paradise Blvd. Corte Madera, CA 94925

Para Plate 15910 Shoemaker Cerritos, CA 90701

Para Plate 3242 East Olympic Blvd. Los Angeles, CA 90023

Penske Truck Leasing 2901 Sunol Drive Vernon, CA

Petroleum Testing Services, Inc. 12051 Rivera Road Santa Fe Springs, CA 90670

Plastic Materials, Inc. 3033 W. Mission Road Alhambra, CA 91803

Polymer Industries, Inc. 444 Athol Street San Bernardino, CA 92401

Pope and Talbot 48513 Highway 58 Oakridge, OR 97463

Printed Circuits Unlimited Attn: Christopher J. Lamb 8786 Industrial Lane Rancho Cucamonga, CA 91730

Puritan Bennett Corp. Attn: Beverlee Roper 2200 Faraway Ave. Carlsbad, CA 92008 Puritan Bennett Corp. 2310 Camino Vida Roble Carlsbad, CA 92008

Quad Chemical Corp. c/o Lonza Inc. Attn: Jim Potvin 20851 South Santa Fe Ave. P.O. Box 1500 Long Beach, CA 90801

Quality Fabrication, Inc. Attn: Johnson Boru 21045 Osborne Street Canoga Park, CA 91304

Raytheon Magnetic Systems Div. c/o Raytheon Co., Dept. 9210 Attn: Gary R. Cox 6380 Hollister Ave. Goleta, CA 93117-3197

Reed & Graham, Inc. Attn: Leonard Lumby 690 Sunol Street, P.O. Box 5940 San Jose, CA 95150

Reichold Chemical, Inc. c/o Paul, Hastings, Janofsky & Walker Attn: Keith F. Millhouse 555 S. Flower St., 23rd Floor Los Angeles, CA 90071

Resinart Corp. Attn: Gary Uecker 1625 Placentia Ave. Costa Mesa, CA 92627

Riker Lab, Inc. (3M) c/o Latham & Watkins Attn: Michael Feeley 633 W. Fifth St., Ste. 4000 Los Angeles, CA 90071-2007

Robinson Prezioso, Inc. Attn: George Nichol 10950 Dale Street Stanton, CA 90680

S & R Sweeps P.O. Box 2579 Danville, CA 94526

Safety-Kleen Corp. c/o Latham & Watkins Attn: Robin Hulshizer 633 W. Fifth St., Ste. 4000 Los Angeles, CA 90071-2007 Southern California RTD c/o LA Metro Transit Authority Attn: Ronald Stamm 818 W. 7th Street, 4th Floor Los Angeles, CA 90017

Shell Oil Company Attn: Thomas W. Kearns One Shell Plaza, Rm 4876 P.O. Box 2463 Houston, TX 77252-2463

Shell Oil Company for Martinez Mfg. Complex P.O. Box 711 Martinez, CA 94553

Sierracin Corporation Attn: Patricia Sprouse 12780 San Fernando Road Sylmar, CA 91342

Signet Armorlite, Inc. 1001 Armorlite Drive San Marcos, CA 92069

Rodgers Corp. Soladyne Div. Attn: Robert F. Lee One Technology Drive Rogers, CT 06263

Rodgers Corp. - Soladyne Div. 7447 Convoy Ct. San Diego, CA 92111

Southern California Edison Attn: Dawn L. Wilson 2244 Walnut Grove Avenue P.O. Box 800 Rosemead, CA 91770

Southern Pacific Transportation Co. Attn: David W. Long, Esq. One Market Plaza San Francisco, CA 94105

Honeywell, Inc. Attn: Stacy L. Bogart for Sperry Aerospace & Marine Group Honeywell Plaza (MN12-8251) 2701 4th Ave. South Minneapolis, MN 55408-1792 Structural Composities Industries c/o Taylor-Wharton Gas Equipment Attn: Frank Henderson 2004 US 92 East P.O. Drawer "A" Plant City, FL 33566

Supracote, Inc. Attn: John Koenig, Environmental Manager 11200 Arrow Route Rancho Cucamonga, CA 91730-4805

Swedlow, Inc. Attn: Charles E. Whisonant, Esq. 1201 Dove Street, Ste 370 Newport Beach, CA 92660

Swedlow, Inc. 12122 South Western Avenue Garden Grove, CA 92642

Teledyne, Inc. Attn: Marney Buchanan, Esq. 1901 Avenue of the Stars, Ste 1800 Los Angeles, CA 90067-6046

Texaco Research Lab c/o Texaco, Inc. Attn: Gordon Turl 10 Universal City Plaza, Room 710 Universal City, CA 91608-1097

Todd Pacific Shipyards Attn: Allen Rainsberger 1801 16th Ave., SW Seattle, WA 98124

Transamerican Plastics Corp. Attn: Shashank Patel 5601 East Santa Ana Street Ontario, CA 91761

Treasure Chest Advertising, Inc. Attn: Harry Jones 3440 Brownsmill Road, SE Atlanta, GA 30354

Chem Tech Systems
Attn: Jaqualyn D. Forrest
for Triple J. Pacification Facility
3650 East 26th Street
Los Angeles, CA 90023

Troy Lighting, Inc. - Tiffany Div. 16815 Johnson Drive City of Industry, CA 91744 Troy Lighting, Inc. - Tiffany Div. 14625 East Clark Avenue City of Industry, CA 91746

Tubing Seal & Cap Attn: John A. Draxler 601 South Vincent Ave. Azusa, CA 91702

Unocal Corporation-Santa Maria Refinery Attn: Rajeev Sane 1201 West 5th Street Los Angeles, CA 90051

United Parcel Services c/o Morrison & Foerster Attn: Kimberly Bick 19900 MacArthur Blvd. Irvine, CA 92715-2443

Universal City Studios, Inc. c/o Gilchrist & Rutter Attn: Donald Nanney 1299 Ocean Ave., Ste. 900 Santa Monica, CA 90401

University of California Irvine, Los Angeles, San Diego
c/o Regents of University of California
Office of General Counsel
Attn: Elyse Axell
300 Lakeside Drive, 7th Floor
Oakland, CA 94612-3565

Urethane Industries 550 W. Crowther Avenue Placentia, CA 92670

Van Waters & Rogers Attn: Allan Bakalian 6100 Carillon Point Kirkland, WA 98033

Velie Circuits, Inc. 1267 Logan Avenue Costa Mesa, CA 92626

Ventura Towne House Attn: Frank J. Drabickas 4900 Telegraph Road Ventura, CA 93003

W & B Marketing-Alumiframe Attn: Ken Klein 12730 Raymar Street North Hollywood, CA 91605 Walt Disney Co. Attn: Robert A. Antonoplis 500 South Buena Vista Street Burbank, CA 91521

Weber Aircraft c/o Thelen, Marrin, Johnson & Bridges Attn: Shea Lukacsko 333 South Grand Ave., Ste. 3400 Los Angeles, CA 90071 Western Metal Decorating Co. Attn: Scott Brotzman 8875 Industrial Lane Rancho Cucamonga, CA 91730

Whittier City Yard Attn: Tom Mauk 13230 Penn Street Whittier, CA 90602

APPENDIX B

OMEGA CHEMICAL CORPORATION AND DENNIS O'MEARA

Omega Chemical Corporation 12504 East Whittier Blvd. Whittier, CA 90602

Dennis O'Meara 12504 East Whittier Blvd. Whittier, CA 90602

DATE AR # yy/mm/dd	AUTHOR	ADDRESSEE	SUBJECT
81/06/29 AR 1	Leon Directo Los Angeles County - Sanitation Districts	Clyde Haight City of Whittier	Ltr: Industrial wastewater discharge permit #8513, 1981 & 1987 amendments & analysis, w/attchs & TL to K Lawrence fr D O'Meara 2/8/95 (faxed 2/8/95)
81/10/06 AR 2	Harvey Collins CA Dept of Health Services	Omega Chemical Corp	Interim status document (attch A)
85/06/26 AR 3	Brian Villalobos LeRoy Crandall & Assoc	Steve Simpson Omega Chemical Corp	Ltr: Investigation of subsurface soil contamination at tank farm at site, w/map, boring log & sampling & analysis data
87/08/26 AR 4	David Lloyd Leighton & Assoc, Inc	Paul Hendricks Darling, Wold & Agee	Ltr: Results of lab analysis performed on soil samples collected after removal of underground tank on Fred R Rippy Trust property, w/maps & apps A & B
87/10/08 AR 5	Dennis O'Meara Omega Chemical Corp	Environmental Protection Agency - Region 9	Hazardous waste permit applications, w/supplements
88/02/02 AR 6	Charles Keller Environmental Research & Technology, Inc	Michael Ashby Thomson & Nelson	Ltr: Rpt on soil vapor survey of Fred R Rippy Trust real property, w/maps & soil gas survey results (draft)
88/10/00 AR 7	Paul Miller ENSR Consulting & Engineering	Thomson & Nelson	Rpt on site assessment investigations
91/10/03 AR 8	Jeff Zelikson Environmental Protection Agency - Region 9	Omega Chemical Corp	Administrative order on consent in matter of Omega Chemical Corporation, respondent, w/table of contents & attchs 1-5
92/01/01 AR 9	CA Environmental Protection Agency - Dept of Toxic Substances Control		List of generators with contributions more than 10 tons between 1/1/88 & 1/1/92, w/TL to J Jaros fr S Amirebrahimi 2/2/95 (faxed 2/2/95)
92/01/05 AR 10	Dennis O'Meara Omega Chemical Corp	Environmental Protection Agency - Region 9	Interim measures workplan, w/inspection plan of 10/29/90 (appendix E)
93/08/07 AR 11	Craig Benson Ecology & Environment, Inc	William Lewis Environmental Protection Agency - Region 9	Site assessment, w/post it TL to R Martyn 1/18/95 & funding justification for site removal action activities (faxed 1/18/95) (redacted, FOIA ex 4)
94/10/25 AR 12	Omega Chemical Corp	÷	Meeting of generators, 10/25/94

DATE AR #	AUTHOR	ADDRESSEE	SUBJECT
***************************************		****************	
94/12/05 AR 13	Ernest Williams CA Superior Court	Omega Chemical Corp	Findings of fact, conclusions of law, judgment re contempt, people of State of CA v Omega Chemical Corporation & Dennis O'Meara (faxed 2/1/95)
95/01/19 AR 14	Randy Randall Ecology & Environment, Inc	,	Description sheet, w/20 2x2 color slides (labeled)
95/01/30 AR 15	Nancy Nadel Environmental Protection Agency - Region 9	Dennis O'Meara Omega Chemical Corp	Ltr: Site visit 1/19/95 shows conditions in violation of consent order signed 10/3/91, send inspection records, w/o cert mail receipt #P424-454-429
95/01/31 AR 16	Micromedex, Inc		Databank information re polymethylene polyphenyl isocyanate
95/02/01 AR 17	Omega Chemical Corp		Agenda for potentially responsible party (PRP) committee meeting
95/02/01 AR 18	Omega Chemical Corp		Attendance list for potentially responsible party (PRP) group meeting
95/02/02 AR 19	Judith Praitis Sidley & Austin	Nancy Long CA Dept of Health Services - Toxic Substances Control Div	Ltr: Steering committee response & developments to 2/1/95 meeting re site, w/TL to J Jaros fr D O'Meara & fax confirmation sheet (faxed)
95/02/07 AR 20	International Technology Corp		Site stabilization workplan, w/TL to K Lawrence fr D O'Meara (faxed)
95/02/08 AR 21	International Technology Corp	Omega Chemical Corp	Revisions to draft workplan & health & safety plan, w/TL to K Lawrence fr L Chase (faxed)
95/02/08 AR 22	Ecology & Environment, Inc		Site-specific info fr generic health & safety plan & section 13-blank site-specific health & safety plan summary, w/TL to K Lawrence fr M Soft (faxed)
95/02/08 AR 23	International Technology Corp	Omega Chemical Corp	Corrected workplan for drum storage stabilization & 2 pp for health & safety plan, w/TL to K Lawrence fr J Stapleton (faxed)
95/02/08 AR 24	Mike Schwennesen Ecology & Environment, Inc	Kathryn Lawrence Environmental Protection Agency - Region 9	Memo: Review of drum storage stabilization health & safety plan (faxed)

DATE AR #	AUTHOR	ADDRESSEE	SUBJECT
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95/02/08 AR 25	Dennis O'Meara Omega Chemical Corp	Kathryn Lawrence Environmental Protection Agency - Region 9	Ltr: Omega has on-site personnel to maintain security & integrity of site on 24-hour basis 7 days a week & will respond to emergency (faxed)
95/02/08 AR 26	Kathryn Lawrence Environmental Protection Agency - Region 9	Dennis O'Meara Omega Chemical Corp	Ltr: Review & acceptance of revised final workplan & health & safety plan section IT Corp submitted 2/8/95, w/stipulation agreement signature page
95/02/08 AR 27	International Technology Corp		Corrected workplan, w/TL to K Lawrence fr J Stapleton (faxed)
95/02/08 AR 28	Kathryn Lawrence Environmental Protection Agency - Region 9	Dennis O'Meara Omega Chemical Corp	Ltr: Review of revised draft workplan & health & safety plan sections submitted 2/8/95, issues not addressed, revise & resubmit by 2/8/95
95/02/08 AR 29	Kathryn Lawrence Environmental Protection Agency - Region 9	Dennis O'Meara Omega Chemical Corp	Ltr: Review of workplan submitted 2/8/95 for stabilization work, issues not addressed, w/marginalia
95/02/09 AR 30	Kathleen Yokota CA Dept of Health Services - Toxic Substances Control Div	Sayareh Amirebrahimi CA Dept of Health Services - Toxic Substances Control Div	Memo: Review of health & safety plan, w/TL to K Lawrence fr K Yokota & attchs (draft) (faxed)
95/02/09 AR 31	Nancy Nadel Environmental Protection Agency - Region 9	Dennis O'Meara Omega Chemical Corp	Ltr: Financial assurance for compliance with order, 1/95 rpt due in 10 days of receipt this ltr, w/p 33 of order & w/o cert mail receipt #P389-856-104
95/02/09 AR 32 -	Kathryn Lawrence Environmental Protection Agency - Region 9	Dennis O'Meara Omega Chemical Corp	Ltr: Revisions need to be made to health & safety practices, not received revisions & workplan due 2/10/95, w/stipulations agreement signature page
95/02/17 AR 33	Dennis O'Meara Omega Chemical Corp	Sayareh Amirebrahimi CA Dept of Health Services - Toxic Substances Control Div	Ltr: Transportation workplan, requests meeting
95/02/17 AR 34	Judith Praitis Sidley & Austin	Nancy Long CA Dept of Health Services - Toxic Substances Control Div	Ltr: Comments on draft consent order circulated 2/1/95, w/o encl
95/02/17 AR 35	Dennis O'Meara Omega Chemical Corp	Sayareh Amirebrahimi CA Dept of Health	Ltr: Transportation workplan - schedule of removal activities, w/TL to R Martyn fr D

DATE AR #	AUTHOR	ADDRESSEE	SUBJECT
		Services - Toxic Substances Control Div	O'Meara (faxed)
95/02/22 AR 36	Dennis O'Meara Omega Chemical Corp	Sayareh Amirebrahimi CA Dept of Health Services - Toxic Substances Control Div	Ltr: Transportation workplan - interim remedial action workplan will be submitted by 3/3/95, w/TL to R Martyn fr D O'Meara (faxed)
95/03/02 AR 37	Daniel Coffey Law Office of Daniel Wayne Coffey	Nancy Long CA Dept of Health Services - Toxic Substances Control Div	Ltr: Request concerning consent agreement, discussion with PRP group, & EPA access to site (faxed 3/3/95)
95/03/03 AR 38	International Technology Corp	Dennis O'Meara Omega Chemical Corp	Interim measures removal action workplan (draft)
95/03/03 AR 39	Dennis O'Meara Omega Chemical Corp	Sayareh Amirebrahimi CA Dept of Health Services - Toxic Substances Control Div	Ltr: Interim removal action plan, w/o attch
95/03/06 AR 40	Mike Schwennesen Ecology & Environment, Inc	William Lewis Environmental Protection Agency - Region 9	Site assessment rpt, w/photos & attendees of 2/1/95 meeting
95/03/06 AR 41	Dennis O'Meara Omega Chemical Corp	Richard Martyn Environmental Protection Agency - Region 9	Ltr: Submitted workplan for removal of drums & equipment to you & Department of Toxic Substances Control (faxed)
95/03/07 AR 42	Mike Schwennesen Ecology & Environment, Inc	Richard Martyn Environmental Protection Agency - Region 9	Handwritten note re EPA codes have been checked & are acceptable, w/HAZCAT list of codes per each drum (faxed)
95/03/10 AR 43	Ecology & Environment, Inc		HAZCAT info of partial inventory obtained in process of IT Corp drum overpacking, w/TL to R Martyn fr M Schwennesen & marginalia (faxed)
95/03/22 AR 44	Janet Carlson Environmental Protection Agency - Region 9	Daniel Coffey Law Office of Daniel Wayne Coffey	Ltr: Interim measures & removal action workplan of 3/3/95 fails to properly carry out drum removal action, options for cleanup, w/attchs
95/03/22 AR 45	Daniel Coffey Law Office of Daniel Wayne Coffey	Janet Carlson Environmental Protection Agency - Region 9	Ltr: Questions re interim measures & removal action workplan 3/3/95, clarification of points, w/TL to J Carlson & N Nadel fr D Coffey (faxed 3/23/95)
95/03/29 AR 46	Hamid Saebfar	Donald White	Ltr: Site referral fr CA Department of Toxic

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OMEGA CHEMICAL CORPORATION Superfund Removal Site Whittier, California ADMINISTRATIVE RECORD CUMULATIVE INDEX IN CHRONOLOGICAL ORDER

DATE AR # yy/mm/dd	AUTHOR	ADDRESSEE	SUBJECT
	CA Dept of Health Services - Toxic Substances Control Div	Environmental Protection Agency - Region 9	Substances Control to US EPA
95/04/05 AR 47	Janet Carlson Environmental Protection Agency - Region 9	Daniel Coffey Law Office of Daniel Wayne Coffey	Ltr: EPA will take over primary responsibility for removal action fr CA Department of Toxic Substances Control, request for access, w/access agreement
95/04/28 AR 48	Sandy Farber Environmental Protection Agency - Region 9	. •	Memo: Other documents considered or relied upon for site administrative record
95/04/28 AR 49	Environmental Protection Agency - Region 9		List of US EPA guidance documents consulted during development & selection of response action for site
95/05/01 AR 50	Richard Martyn Environmental Protection Agency - Region 9	Jeff Zelikson Environmental Protection Agency - Region 9	Action memo: Request for removal action, w/o appendices & enforcement addendum (redacted, FOIA ex 7)

No. of Records:50 \arfincm2.rpt